

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LINDA J. BLOZIS,

Plaintiff,

VS.

**MELLON TRUST OF DELAWARE,
NATIONAL ASSOCIATION; MELLON
BANK, NATIONAL ASSOCIATION;
MELLON FINANCIAL
CORPORATION,**

Defendants.

: CIVIL ACTION NO. 05-891 (SLR)

**DEFENDANTS' MOTION IN LIMINE TO EXCLUDE EVIDENCE
CONCERNING ALLEGED INTERACTIONS WITH FEMALE EMPLOYEES**

Defendants Mellon Trust of Delaware, National Association, Mellon Bank, National Association, and Mellon Financial Corporation (collectively, “Defendants”) hereby move this Court, for an Order in the form attached hereto precluding Plaintiff from offering evidence of alleged interactions between Brendan Gilmore and certain female employees under Rules 401, 402, 403 and 602 of the Federal Rules of Evidence, along with such other and further relief the Court deems just, proper, and equitable. The grounds for this motion are set forth fully in the

accompanying memorandum of law dated May 22, 2006, the exhibits thereto, and upon all of the pleadings and proceedings heretofore had herein.

Respectfully submitted,

REED SMITH LLP

By: /s/ Thad J. Bracegirdle

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National Association, and Mellon Financial
Corporation.

Dated: May 22, 2007

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Defendant.

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: CERTIFICATE OF SERVICE
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I, Thad J. Bracegirdle, being a member of the Bar of this Court, do hereby certify
that on May 22, 2007, I caused a true and correct copy of **DEFENDANTS' MOTION IN
LIMINE TO EXCLUDE EVIDENCE CONCERNING ALLEGED INTERACTIONS
WITH FEMALE EMPLOYEES** to be served by electronic filing with the Court upon the
following counsel of record:

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And

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s/Thad J. Bracegirdle
Thad J. Bracegirdle (No. 3691)